

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

FRANTZ SAMSON, a Washington resident,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

UNITEDHEALTHCARE SERVICES, INC.,

Defendant.

Case No. 2:19-cv-00175-MJP

**JOINT MOTION AND ~~PROPOSED~~  
ORDER TO EXTEND DEADLINES  
FOR DECERTIFICATION  
BRIEFING BY ONE WEEK**

**NOTED FOR CONSIDERATION:**  
SEPTEMBER 6, 2024

The parties respectfully request that the Court extend by one week the deadlines for briefing on Defendant's motion for decertification (Dkt. No. 311) and Defendant's corresponding motion to seal (Dkt. No. 310). In support of this motion, the parties stipulate as follows:

WHEREAS, on July 22, 2024, Defendant filed a motion to decertify the classes (Dkt. No. 311) and a corresponding motion to seal (Dkt. No. 310);

WHEREAS, following Defendant's motion to decertify, Plaintiff served discovery, including Federal Rule of Civil Procedure 30(b)(1) and 30(b)(6) deposition notices concerning evidence Defendant submitted in connection with its decertification motion;

WHEREAS, Plaintiff submitted a request for production of additional call recordings following the submission of Defendant's motion to decertify and also took depositions of call-agent witnesses for trial whom Defendant had identified pursuant to the case schedule;

JOINT MOTION AND ~~PROPOSED~~ ORDER TO  
MODIFY CASE SCHEDULE - 1  
Case No. 2:19-cv-00175-MJP

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WHEREAS, Defendant agreed to re-note its decertification motion for September 27, 2024, and the Court granted the parties' stipulated motion to extend the deadline for Plaintiff's response to September 6, 2024, and Defendant's reply to September 27, 2024 (Dkt. No. 322);

WHEREAS, Plaintiff received the transcript of the deposition he took on August 29, 2024 at around 8:20 a.m. on September 6, 2024, and Plaintiff received the transcript for the deposition he took on September 4, 2024 at 11:30 a.m. on September 5, 2024;

WHEREAS, Defendant produced additional recordings at Plaintiff's request on September 3, 2024;

WHEREAS, Plaintiff requests an additional week to enable sufficient time for Plaintiff to review and account for the deposition transcripts and additional recordings;

WHEREAS, the parties have conferred, and Defendant does not oppose the relief that Plaintiff seeks in this motion;

WHEREAS, the parties propose the following:

Event	Current Date	Proposed Date
Plaintiff's Response to Decertification Motion and Response to Motion to Seal	September 6, 2024	September 13, 2024
Defendant's Reply in Support of Decertification Motion and Motion to Seal	September 27, 2024	October 4, 2024

Accordingly, the parties request that the Court modify the case schedule as follows:

Event	Date
Plaintiff's Response to Decertification Motion and Motion to Seal	September 13, 2024
Defendant's Reply in Support of Decertification Motion and Motion to Seal	October 4, 2024

RESPECTFULLY SUBMITTED AND DATED this 6th day of September, 2024.

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*Attorneys for Defendant*

ORDER

IT IS SO ORDERED.

DATED this 10th day of September, 2024.



THE HONORABLE MARSHA J. PECHMAN